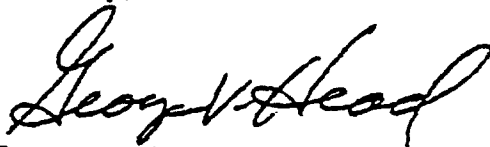


Sprint provided Pacific Bell with forecasts several weeks ago that have not been exceeded. Also, improvements have been made in Sprint's order accuracy that reduced orders rejected by Pacific Bell to less than 8%. Additionally, Sprint has committed resources to install Network Data Mover (NDM) interface to Pacific Bell on or about February 1, 1997. Sprint acknowledges Pacific Bell's effort to hire additional staff, including addition of evening shifts.

I would remind Pacific Bell of its commitment to achieve 95% or better performance on its 24 hour FOC and completion objective by January 1, 1997. Pacific Bell's lack of performance is significant and is an impediment to Sprint's plans to successfully enter the California market.

I am requesting your written response to Sprint's concerns by December 23, 1996.

Sincerely,



George V. Head  
Vice President  
Local Market Integration

PC: Liz Fetter  
Lee Bauman  
Michael Mallen  
Janet Aiken-James  
Gary R. Owens  
Ellen D'Amato  
Paul Wescott  
Bill Dorrance

Printed By: Gary R. Owens

Page: 1

1/21/97 7:30 A

From: Gary R. Owens (1/21/97)  
To: Elizabeth Fetter  
CC: George Head, Denise Lundberg, Paul Wescott  
PacBell escalation call 1-20-97

## ATTACHMENT B

Liz Fetter  
President-Industry Markets  
PacBell

Liz:

This is a short note to bring to your attention a very unsuccessful conference call with Mr. Stankey and Mr. Mallen yesterday afternoon.

I was hoping you were going to be on the call as your secretary had indicated. In lieu of your not being present, George Head and I conferenced with John and Mike on the topic of past due completion orders from PacBell to Sprint.

As you and I had discussed on Friday, January 17, our expectation was that by Saturday we would have all the backlogged and past due order completions current. This would place us in a current position to begin our advertising this week. George and Jerry Sinn talked Sunday night and again Monday morning and established that we agreed that we still had somewhere in the (close to) 100 orders overdue and essentially no progress was made over the weekend (I don't remember the exact number of orders at this moment).

On the call yesterday we reviewed these facts and asked John and Mike for what we should expect going forward. I was more than surprised to hear their answer: "We cannot provide you with any better service than what we provide to your competitors".

In what needs to be a positive, partnering relationship between us...this kind of service assurance is not acceptable. As you and I talked on Friday, we are still willing and planning to send staff to work hand in hand with your staff (the Quality Team) on Thursday to mutually improve our interactive processes.

I need to know from you if you are still committed to this meeting and process improvement meeting in San Francisco? We are, and very much think we can make mutual progress. But, if in the end we are relegated to "parity of the worst service being given...", our efforts may be overly optimistic.

I would like your response today. We need to know where your team stands on this issue and opportunity for improvement.

By this note, I will ask Denise to set up time for you and I to talk today.

Thanks.

Gary Owens  
VP-Operations  
Sprint National Integrated Services

=====

From: Gary R. Owens

Page: 1

2/18/97 8

From: Liz Fetter (2/22/97)

To: Gary R. Owens

CC: Denise Lundberg

Mail\*Hub: QMIN2

Response To Your E-Mail From This A.M.

Gary Owens

Vice President Operations

Sprint National Integrated Services

ATTACHMENT C

Gary,

I am sorry that I was not able to be on the call, but I had to adjust my schedule for a doctor's appointment.

I have spoken with Mike Mallen regarding the conference call with you and George Head. He also was not pleased with the outcome, but believes that with cooperation from both companies, a meaningful resolution can occur. We completely support a "positive, partnering relationship," and are still willing to work with Sprint to improve processes and service.

I must emphatically stress the importance of offering resale services equally to all CLC's through our LISC and apologize for what you feel is an unacceptable level of service.

We are continuously challenged by the complexity and volume in our service center while we introduce mechanization into what is now predominantly a manual process for this new business in both of our companies. As we work through these challenges, we need Sprint's continued support and participation in our effort to continuously improve. We still believe that the meeting scheduled between our teams this Thursday is of value and should occur.

We will do whatever it takes to make this business successful, but as with all new businesses, a reasonable time frame is required. You have the commitment of myself and my team to work with Sprint to make this a successful effort.

Sincerely,

Liz Fetter  
President, Industry Markets Group  
Pacific Bell

Liz Fetter Phone:415.545.9969 Fax:415.547.0665

\*\*\*\*\*

ATTACHMENT D



Gary R. Owens  
Vice President - Operations

National Integrated Services  
7301 College Boulevard  
Overland Park, KS 66210  
Telephone (913) 534-6106  
Fax (913) 534-6302

February 5, 1997

Elizabeth Fetter  
President, Industry Markets Group  
Pacific Bell  
370 Third Street, Room 714A  
San Francisco, California 94107

Dear Ms. Fetter:

As you know, Sprint has been preparing to enter the local market ever since the California Public Utilities Commission issued its order authorizing local competition on March 31, 1996. On April 17, 1996, prior to placing its brand on a commercial offering, Sprint commenced its effort by testing Pacific's resale product offering. As you are well aware from our numerous conversations, Sprint's California market entry plans have been repeatedly delayed due to the significant problems experienced with Pacific's resale offering during this test. The most serious problem was Pacific's inability to generate and transmit to Sprint accurate and timely Call Detail Records (CDRs) which were necessary for Sprint to bill its end users. Sprint expended substantial resources during this test period to assist Pacific in identifying and attempting to correct the sources of these flaws in Pacific's systems.

Pacific eventually achieved minimally acceptable business process performances, at extremely low volumes, during the test period which enabled Sprint to begin offering local service in California on December 2, 1996, by reselling Pacific Bell's service in San Diego. However, since that time, Pacific has failed to process in a timely and accurate manner the modest number of customer orders Sprint has submitted. Pacific's service level performance has been unsatisfactory and has caused significant problems for our customers. It also has prevented the expansion of Sprint's California local service offering. We have been compelled to escalate our concerns to you and your executive staff more than ten times in the last two months. Nevertheless, Pacific repeatedly has failed to deliver on its commitments to improve its performance.

Since the inception of our service offering, Pacific has grossly and repeatedly failed to meet its obligation to process Sprint's orders in a way that provides parity treatment with Pacific's own end users. These service problems have occurred despite the fact that

Sprint's order volumes have consistently been below the forecasted levels provided in advance to Pacific. The problems include:

- Firm Order Confirmations (FOCs) and Completion Notices are chronically late with a daily backlog of 150-200 orders. This causes Sprint to miss customer commitments on due dates and unacceptably delays the delivery of product literature and initial invoices to customers. In our interconnection agreement, Sprint and Pacific agreed to 95% of FOCs returned in 4 hrs. in a mechanized environment and during the manual interim period 95% within 24 hrs. Results tracking from 1/13/97 to 2/3/97 shows an average of 4% of FOCs were processed in accordance with the time guidelines in the mutually agreed upon performance standards. On Pacific Bell's best day, only 43% were processed in a timely fashion. On several days, no FOCs were processed within the 24 hour time period.
- In December, 12 Sprint customers lost dial tone during migration from Pacific to Sprint due to improper handling of the related disconnect/install orders by Pacific. Three of these 12 customers blamed Sprint for their loss of telephone service. Consequently, the customers canceled their new Sprint local service and returned to Pacific Bell.
- Sprint continues to receive other CLECs' FOCs and Completion Notices from Pacific. This leads us to believe that other CLECs are receiving Sprint's FOCs. Failure to accurately direct FOCs prevents Sprint from meeting its customer commitments and constitutes a breach of Pacific's duty to protect customers' CPNI.
- When customers migrate to Sprint service, Pacific's inaccurate entry of customer information frequently causes customers to lose vertical features, such as Call Waiting or Caller ID.

Sprint established a joint Quality Team with Pacific Bell which met on January 23<sup>rd</sup> and 24<sup>th</sup> to address these order processing problems. Root causes of the problems were identified, process flows were created, control points were identified and the team agreed upon specific process improvements which, when implemented, will eliminate the problems. In addition, two Quality members worked through the order confirmation backlog, reducing it in five hours from 178 to 33 orders. This demonstrates what a focused effort can produce. The team agreed to implement the new procedures by January 27, 1997. However, Pacific did not implement the necessary changes in a timely and complete manner and has allowed the backlog of order confirmations to return to unacceptable levels. Pacific also has indicated that Sprint should not expect to experience any improvement until additional service order representatives are deployed by Pacific later this month. Sprint is concerned that additional resources is not the total solution and

management of the agreed upon processes would significantly improve the results as agreed and demonstrated by the Quality Team.

Pacific has pointed to the constraints it experiences in manually processing Sprint's orders sent via facsimile and has urged Sprint to transmit its orders via an interim electronic system. Sprint will shortly begin using this interim system, Network Data Mover (NDM), but understands that this process, too, requires Pacific to manually intervene in the processing of each order. Therefore, the requirement for adequate quality controls is not eliminated with the use of NDM.

Sprint is requesting your personal immediate attention to improving the procedures and performance of Pacific's local resale offering so that Sprint local service customers experience the same level of service quality and timeliness of order processing as Pacific provides to its own end users. The backlog of FOCs and Completion Notices must be made current no later than 5:00 p.m. PST February 7, 1997 and Sprint's orders must be processed thereafter in a timely manner. If Pacific is unable to meet this minimal requirement, then Sprint will be forced to pursue other remedies.

Sincerely,



Gary R. Owens

cc: Wayne Peterson

ATTACHMENT E



**Paul A. Wescott**  
*Director - Local Market Development*  
*National Integrated Services*  
150 Spear Street, Suite 1400  
San Francisco, CA 94105  
Phone: (415) 357-5522  
Fax: (415) 495-0208  
E-mail: paul.wescott@mail.sprint.com

Via Facsimile and U.S. Mail

February 17, 1997

Mark Turner  
Pacific Bell  
370 Third Street, Room 316  
San Francisco, CA 94107

Dear Mark:

Pacific Bell's lack of responsiveness continues to frustrate Sprint's attempts to replace our current faxed order process for local resale with Network Data Mover (NDM). I have documented our experience to date with Pacific Bell below. I am requesting your active participation in providing Sprint with the appropriate resources and responses needed to perform and complete testing as agreed upon in our many meetings on this subject. The immediate need is for Pacific to fulfill its commitment to provide Sprint with same-day status on test files transmitted via NDM both during "Connectivity and File Structure" testing and "PON" testing. Sprint still is waiting for Pacific's status on our transmission sent four days ago on 2/13/97. I expect Pacific to provide Susan Walter and Randy Campbell with status on the 2/13/97 transmission no later than 12:00 noon PST on 2/18/97 and that status on all future transmissions will occur on the same day.

**Sprint - Pacific Bell NDM Chronology**

- Sprint received data lay-out documentation from Pacific Bell in late December.
- The development kick-off meeting with Pacific Bell was held on 1/9/97. Since the initial meeting, we have held weekly status meetings to discuss questions regarding the data layout, operational/business rules and testing logistics. Since the first meeting, we have communicated a testing ready date of February.
- On 1/15/97, Susan Walter sent a message to Josh Goodell requesting documentation on RMI changes. In that email, Susan Walter stated that we planned to implement the interface in February.
- Around 1/23/97, Paul Gurken (Pacific Bell NDM coordinator) sent Bob Bickett (Sprint NDM coordinator) paperwork that needed to be completed in order to set up the NDM link. The Pacific Bell account team was not aware that this paperwork was sent nor was Susan Walter. Bob did not complete the paperwork at that time because Pacific Bell did not describe its purpose.

Mark Turner  
02/18/97  
page 2

- At the 1/29/97 status meeting, we communicated to Pacific Bell that we would like to begin testing with mocked up data (Pacific refers to this as "Connectivity" and "File Structure" testing) on 2/3/97 and end to end testing (Pacific Bell refers to this as "PON" testing) beginning 2/17/97. Pacific Bell's technical point of contact was unable to attend that call, however, the account team agreed to follow up with her to ensure that Pacific could accommodate a 2/3/97 (or week of 2/3/97) date.
- On 1/30/97, Susan Walter received both a voicemail and an email from Janine Collins regarding the testing. Janine indicated that Pacific Bell required a 2-3 week lead time before testing or implementation could begin. Since Pacific's technical point of contact was out of the office, Janine could not commit to a date when testing could begin. She also stated that Sprint had not returned paperwork to Paul Gurken (this was the first time Susan Walter heard about the paperwork).
- On 1/31/97, Bob Bickett provided Paul Gurken the information needed by Pacific Bell to set up the link. We were told by Pacific that they would set up security, etc. and that we could then begin testing.
- At the 2/5/97 status meeting, Pacific still believed that Connectivity and File Structure testing could be accomplished by the end of the week.
- On 2/6/97, Susan Walter left a message for Janine asking her to ensure that Paul Gurken treated our requirement as priority.
- On 2/7/97, Bob Bickett received a message from Paul Gurken stating that he was working from home that day and would contact Bob on 2/10/97.
- On 2/10/97, Susan Walter left another message for Janine Collins advising that we had not yet heard from Paul Gurken. Susan Walter also paged Josh Goodell, however, he was unable to return the page. He left me a message late in the day advising that he would follow up with Paul Gurken.
- On 2/11/97, Josh advised me that Paul Gurken was out sick and had been since Friday and that Pacific was looking for someone to replace Paul.
- On 2/12/97, Josh agreed to have Paul's replacement contact our technical staff (Randy Campbell and Bob Bickett) on 2/13/97 to discuss status. At the 2/12/97 meeting, Sprint also provided a test plan to Pacific. Sprint agreed to send orders in the morning and leave a message when the file was transmitted. Pacific agreed to provide Sprint with feedback regarding the transmitted file on the same day.
- On 2/13/97, after a call between Bob Bickett, Randy Campbell and Pacific's NDM contact, a file was sent via NDM to Pacific Bell. Pacific was notified by Sprint that the file had been sent. Susan Walter left a voicemail message for Josh Goodell asking for status on the NDM transmission. Randy Campbell left an urgent message for Kerrin Beland requesting status. Sprint did not receive a response to either message.
- On 2/14/97, Randy Campbell left another message for Kerrin Beland. Susan Walter left another message for Josh Goodell. Josh replied to this message at 7:00 p.m. CST, but was unable to provide status on the prior day's transmission.



Mark Turner  
02/19/97  
page 3

- Today, 2/17/97, Sprint has yet to receive any status on the 2/13/97 transmission and therefore, the schedule for PON testing and NDM deployment targeted for 3/1/97 are now both in jeopardy.

I look forward to your efforts to ensure that Sprint experiences no further delays in its efforts to complete NDM testing and replace the current fax order process with NDM transmissions. Please call me with any questions or comments you may have regarding this issue.

Sincerely,



Paul Wescott

cc: Susan Walter  
Carol Bussing  
George Head

**CERTIFICATE OF SERVICE**

I, KATHERINE MCMAHON, hereby certify that I have this day served a true copy of the "Complaint of NewTelco, L.P., d/b/a Sprint Telecommunications Venture (U-5552-C) and Sprint Communications Company L.P. (U-5112-C) v. Pacific Bell (U-1001-C)" upon the parties listed below by messenger delivery:

Marlin Ard  
Pacific Bell  
140 New Montgomery Street,  
Room 1517  
San Francisco, CA 94105

Thomas J. MacBride, Jr.  
John L. Clark  
Goodin MacBride Squeri Schlotz &  
Ritchie, LLP  
505 Sansome Street, 9th Floor  
San Francisco, CA 94111

Commissioner Jessie J. Knight, Jr.  
California Public Utilities Commission  
505 Van Ness Avenue, Room 5205  
San Francisco, CA 94102

Monica McCray, Staff Counsel  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

William C. Harrelson  
David J. Marchant  
MCI Telecommunications Corporation  
201 Spear Street, 9th Floor  
San Francisco, CA 94105

William A. Ettinger  
AT&T Communications of California, Inc.  
795 Folsom Street, Room 625  
San Francisco, CA 94107

ALJ Glen Walker  
California Public Utilities Commission  
505 Van Ness Avenue, Room 5111  
San Francisco, CA 94102

Dated this 20th day of February, 1997, at San Mateo, California.



Katherine McMahon  
Senior Legal Secretary



*Stankey*

0001

1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 IN AND FOR THE STATE OF CALIFORNIA

3 --- o0o ---

4 MCI TELECOMMUNICATIONS CORPORATION,  
Complainant,

5 vs. NO. 96-12-026

6 PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS,  
Defendants.

7

8 AT&T COMMUNICATIONS OF CALIFORNIA, INC.  
Complainant,

9 vs. NO. 96-12-044

10 PACIFIC BELL,  
Defendant.

11 -----//

12

13

14 DEPOSITION OF JOHN T. STANKEY

15 April 8, 1997

16 Volume I, Pages 1 through 194, inclusive

17

18 REPORTED BY:

19 SANDRA L. CARRANZA, CSR NO. 7062, RPR

20

21

22

23

24

25

0002

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2 DEPOSITION OF JOHN T. STANKEY

3

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8 AFTERNOON SESSION 78

9

10 NO EXHIBITS MARKED

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0003

1 APPEARANCES

2

3 FOR PACIFIC BELL:

4 PILLSBURY, MADISON & SUTRO  
BY: ED KOLTO-WININGER, ATTORNEY AT LAW  
5 235 Montgomery Street

San Francisco, California 94104

6

7 FOR MCI:

8 LeBOEUF, LAMB, GREENE & MacRAE  
BY: R. SCOTT PUDDY, ATTORNEY AT LAW  
9 One Embarcadero Center, Suite 400  
San Francisco, California 94111

10

11 FOR AT&T:

12 AT&T  
BY: WILLIAM A. ETTINGER, ATTORNEY AT LAW  
13 795 Folsom Street, Suite 670  
San Francisco, California 94107

14

15 --- o0o ---

16 TAKEN AT:

17 LeBOEUF, LAMB, GREENE & MacRAE  
One Embarcadero Center, Suite 400  
18 San Francisco, California 94111

19

20 --- o0o ---

21

22

23

24

25

0004

1 BE IT REMEMBERED THAT, pursuant to  
2 Notice of Taking Deposition and on Tuesday, April 8, 1997,  
3 commencing at the hour of 9:35 a.m., before me, SANDRA L.  
4 CARRANZA, CSR NO. 7062, RPR, there personally appeared

5

6 JOHN T. STANKEY,

7

itness by the Complainants, who, having been  
orn, was examined and testified as  
et forth.

--- o0o ---

JOHN T. STANKEY

een duly sworn, testified as follows:

EXAMINATION BY MR. PUDDY

PUDDY: Q. Could you please state your name  
rd.

Stankey, J-o-h-n, S-t-a-n-k-e-y.

Stankey, my name is Scott Puddy. I am going  
; your deposition here this morning. Have you  
epos...on taken before?

13 is using, has limitations on what she can take down, so  
14 it's very important that you allow me to finish my  
15 question before you start your answer and, likewise, I  
16 will try to let you finish your answer before I start my  
17 next question.

18 Also, there are some phrases that transcribe  
19 poorly, uh-huh or uhm-hum at the top of the list, so we  
20 should avoid using those phrases. The court reporter can  
21 also only take down spoken words as opposed to nods,  
22 gestures, shakes, that sort of thing, so try to respond  
23 verbally. Do you understand that?

24 A. Yes, I do.

25 Q. Have you reviewed any documents for your  
0007  
1 deposition this morning?

2 A. Yes, I have.

3 Q. Which documents have you reviewed?

4 A. The deposition of Jerry Sinn.

5 Q. Have you ever been convicted of a felony?

6 A. No.

7 Q. Who is your current employer?

8 A. Pacific Bell.

9 Q. What is your position with Pacific Bell?

10 A. Vice president of resale operations.

11 Q. How long have you held that position?

12 A. Since January 16th, 1997, almost three months.

13 Q. And was that the first time that you had any  
14 involvement with the LISC at Pacific Bell?

15 A. Yes, it is.



16 Q. We will get back to that. Prior to January 16,  
17 '97, what was your position?

18 A. I was in the advanced communications network  
19 group that's working on hybrid-fiber coaxial deployment to  
20 residential and consumer neighborhoods. I was responsible  
21 for the overall systems project management and customer  
22 service operations.

23 Q. For how long were you in that position?

24 A. Almost three years, two-and-three-quarters  
25 years.

0008

1 Q. Who did you report to in that position?

2 A. Tim Harden, vice president of ACN deployment.

3 Q. Did you have any people reporting to you when  
4 you were in that position?

5 A. Yes, I did.

6 Q. How many?

7 A. Directly reporting to me would have been seven  
8 individuals at the time I left.

9 Q. Could you briefly describe -- my note taking  
10 didn't keep up with the court reporter's. Can you state,  
11 again, what your job title was at that time?

12 A. I was the executive director of systems  
13 development and customer service.

14 Q. Please describe your job responsibilities as the  
15 executive director for systems development and customer  
16 service?

17 A. There are two parts to the job, really. One of

18 them was to oversee a very large systems development  
19 effort that was necessary to build operational support  
20 systems that were used for managing the network. These  
21 would include systems that are used for monitoring  
22 surveillance, provisioning of customer service, management  
23 of network inventory, et cetera, a fairly broad  
24 cross-section of different support systems. And I was  
25 responsible for the overall integration of the project, to  
0009  
1 deliver those in a cohesive fashion to production.

2       The second part of the job was managing the  
3 customer service operations that included the network  
4 support, network management for both video and the  
5 telephony operations. And in addition to that, was the  
6 provisioning functioning for telephone service, so if a  
7 consumer, who was served by that network, wanted to call  
8 in and request any changes or moves to their phone  
9 service, they would call one of my organizations to have  
10 that done.

11     Q. And are there particular classes of consumers,  
12 who would be making changes for the requests to people  
13 under your control? In other words, are you talking about  
14 residential consumers, are you talking about residential  
15 and business, divided into particular products, or all  
16 product lines?

17     A. It was segmented in a couple of different ways.  
18 The vast majority of them were what I would call  
19 residential subscribers; however, there were some  
20 nonbusiness customers that were also served by this

21 network.

22 Q. What was the name of the group or department  
23 that would receive requests for changes in service in  
24 those customers?

25 A. In the broadband initiative?  
0010

1 Q. The group that was under your direction during  
2 those two-and-three-quarter years.

3 A. Customer service operations is what we refer to  
4 it as.

5 Q. Who was the next person below you with  
6 responsibility for customer service operations during that  
7 time period?

8 A. For provisioning of service requests, the  
9 director was Rollie Killeen. For management of the  
10 network, the individual, the director was Tim Keefe.  
11 Would you like me to spell those?

12 Q. Yes.

13 A. R-o-l-l-i-e, last name, K-i-l-l-e-e-n. And Tim  
14 Keefe, T-i-m, last name, K-e-e-f-e.

15 Q. How many people worked under Rollie Killeen in  
16 connection with the provisioning of the changes?

17 A. I don't recall precisely exactly how many. I  
18 couldn't give you a rough order of magnitude.

19 Q. Could you give me your best order of estimate?

20 A. The organization, at the time I left the  
21 department, was probably about 65 individuals.

22 Q. Did those 65 individuals handle all of the

23 service change orders for Pacific Bell's residential

24 customers system wide?

25 A. For all the telephony subscribers on that  
0011

1 advanced communications network, they were responsible for  
2 handling all their service requests.

3 Q. The advanced telecommunications network, this is  
4 fiberoptic network?

5 A. It's a hybrid-fiber coax network that's deployed  
6 in limited areas of California.

7 Q. Where is it deployed?

8 A. It's deployed in San Jose and San Diego. Those  
9 are the two areas that we have working customers in.

10 Q. So 65 people handling changes just for the  
11 customers in the San Jose and San Diego area who were  
12 using this particular service?

13 A. That's correct, for telephone services.

14 Q. How many customers were there during that time  
15 period that were using this service in San Jose or San  
16 Diego?

17 A. At the time I left the organization, there were  
18 about 3,000 telephone subscribers and about 4,000 video  
19 subscribers.

20 I'd like to clarify previously the number that I  
21 provided you for Rollie's organization. Not all 65 were  
22 directly involved in customer service functions; some were  
23 responsible for other staff support functions.

24 Q. How many were involved in customer service  
25 functions?

0012

1 A. Again, I don't know the exact number, but I

2 would say in terms of front-line customer facing

3 employees, at the time, there was probably about 20.

4 Q. To what extent did you have direct hands-on

5 involvement with the provisioning of service changes for

6 those customers?

7 A. You have to describe what you mean by hands-on

8 involvement.

9 Q. I mean, were you simply supervising Rollie, or

10 did you actually get down and get involved in the nuts and

11 bolts of the process by which orders would be changed,

12 whether you were supervising people or whether you were

13 actively involved in the processes that were going on?

14 A. On the day of the week, it would vary, but given

15 the nature of the assignment and that we were doing an

16 intense amount of systems development to support

17 provisioning of services, that more often than not, I was

18 involved in the details around the design and the trade

19 office, and strategy around how to craft the business

20 processes and the approach to serving the customers.

21 Q. Give me an example of how you might get

22 involved.

23 A. Sure. If we are deciding on an implementation

24 from an architecture perspective of how we would achieve

25 provisioning of a customer service, how we would translate

0013

1 it out into the network, how we would flow orders among

2 the various subsystems within the company to achieve that,

3 I would sit down and, you know, do the analysis with other  
4 individuals who acted as subject matter experts on those  
5 areas, decide something, trade offers around  
6 implementation, approach, risk, cost, et cetera. So I  
7 would do that fairly hands-on in terms of having some  
8 knowledge of what's going on. Now, was I present for each  
9 discrete customer contact? The answer to that is no.

10 Q. I suspected as much. Approximately, when did  
11 you begin your stint as executive director for systems  
12 development and customer service?

13 A. Approximately, in August of 1993.

14 Q. Prior to that, what was your position?

15 A. I was the regional manager for construction,  
16 engineering, assignment, installation and maintenance,  
17 north coast territory.

18 MR. PUDDY: Can you read that back, please?

19 (Record read.)

20 MR. PUDDY: Q. For how long did you serve as  
21 regional manager in that role?

22 A. It was almost two years. I began that  
23 assignment in June of 1991.

24 Q. Could you describe for me your job  
25 responsibilities as regional manager?

0014

1 A. I was responsible for the outside plant  
2 disciplines that handle all of the maintenance and  
3 installation or provisioning work associated with customer  
4 service, as well as the engineering of the outside plant  
5 facilities, and ultimately, building those facilities.

6 Q. Were you involved in the project to construct a  
7 new customer service facility, is that what was going on?

8 A. During this particular assignment?

9 Q. Yes.

10 A. No.

11 Q. You are talking about maintenance engineering  
12 and construction. What was going on, generally, in the  
13 background?

14 A. Generally speaking, there were 765,000 access  
15 lines in the particular territory. And my responsibility  
16 was to ensure that those lines continued to work, and the  
17 customers receive the service that they wanted from a  
18 physical provisioning perspective, actually manipulating  
19 or changing the outside plant to achieve that.

20 Q. You say changing the outside plan, or plant?

21 A. Plant, p-l-a-n-t.

22 Q. The outside plant, you're talking about the  
23 facilities that consist of the lines in which the calls  
24 are trans --

25 A. The copper -- the copper cable or the  
0015  
1 fiberoptics and associated electronics that would deliver  
2 service to the end user.

3 Q. What was the physical territory that was your  
4 area of responsibility?

5 A. The north coast region consists roughly of the  
6 area as far south as Marin county, north to the  
7 California-Oregon border, and as far east as Fairfield.

8 Q. And to what extent, if any, did your job  
9 responsibilities include any customer service functions?

10 A. To a large extent, the job included customer  
11 service functions. The organization is the customer  
12 facing operations organization, so I would have installers  
13 that would go to customers' homes that were responsible  
14 for repairing telephone service or installing new service.

15 Q. So within the physical territory you would, as  
16 described a couple of lines above, if a customer wanted to  
17 add a line to his home or change a service, they would be  
18 talking to someone who was under your control?

19 A. If there was a field visit required, then the  
20 customer could talk to somebody under my control.  
21 Relative to asking for the service request, issuing the  
22 order, they would not be talking to a person in my  
23 organization.

24 Q. And what was the unit or department that would  
25 receive the request if the customer called in requesting  
0016  
1 service?

2 A. Depending on the market segment that the  
3 customer was part of, either business or consumer  
4 residential subscriber, they would speak to somebody in  
5 either our consumer business office or business office.  
6 For the very high-end customer, they would work that  
7 directly with their account executive.

8 Q. And the request for service would somehow be  
9 forwarded to your group to be acted upon?

10 A. That's correct.



11 Q. Do you have any standards that had to be met in  
12 terms of the timeliness in response to requests for  
13 customer service?

14 A. We had internal standards of performance,  
15 standards that we measured and evaluated, yes.

16 Q. What were those standards?

17 A. There are many.

18 Q. I thought I'd escape with the general question  
19 first. Suppose that a customer called in reporting having  
20 lost dial tone. Within what time period were you to  
21 respond to that request?

22 A. There was no set period of which we had an  
23 objective to respond or require to respond. We measured  
24 the receipt to clear duration, which is from the point the  
25 customer calls us to the point in time that we resolve the  
0017

1 customer's trouble, and that would -- that length of time  
2 would be measured. Obviously, shorter was better, but we  
3 did not have a hard and fast standard that said all  
4 customers needed to be cleared in this particular time.

5 Q. Was there a standard within which you endeavored  
6 to have the customers clear?

7 A. Depending on the time of year and depending on  
8 the point in time, where we were during my tenure there,  
9 we always had an objective that we set internally, but it  
10 would vary from point in time of the year or the  
11 particular year that we were in.

12 Q. For example, during the beginning of your